

**OBJECTION TO TRUSTEE'S MOTION TO AFFIRM HIS DETERMINATIONS
DENYING CLAIMS OF CLAIMANTS HOLDING INTERESTS IN JUDY L. KAUFMAN
ET. AL., TENANCY IN COMMON**

We hereby object to the denial of our claim for compensation for investment principal lost in our Madoff-related investment.

As our letter of October 31, 2016 states, we believe that we have provided clear evidence that our investment in the Madoff fund was made, that our losses were incurred and that our claim is valid.

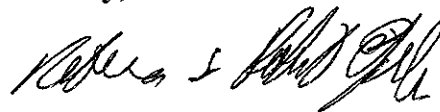
We previously stated that we were unable to provide the required statement of an account in our name only because the Madoff fund in 2003 ignored our written request for such a statement. Madoff continued to issue statements in which principals' accounts were aggregated. We argued that Madoff's practice was an integral part of its fraudulent activity and that the request for the statement failed to recognize that fact and was arbitrary and capricious because the nature of the fraudulent activity made it impossible to fulfill.

We also noted that Mr. Picard's office had ample evidence to name us in its complaint and to attempt to recover funds from us and later sought fit to dismiss us from that claim on the basis of our investing but never having withdrawn any funds. It was clear that Mr. Picard's office had documentation of our investment, and of our never having withdrawn funds. We did not have access to this documentation and our request to provide it was ignored.

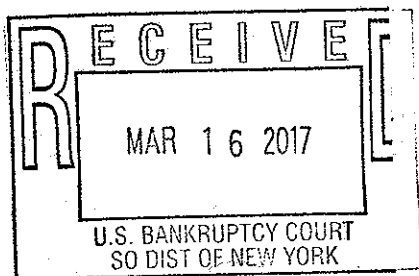
This appears to be a curious situation in which we are considered beyond a doubt to have invested in a Madoff fund, have had legal action taken against us (and eventually dismissed) and are subsequently denied a claim on the basis that our investment cannot be substantiated. Mr. Picard's office has established and acted on the existence of our Madoff investment and should therefore utilize that same standard in the processing of our claim.

We believe that we should be provided the same protection and compensation as other investors. Thank you for your consideration.

Sincerely,



Rebecca and Robert Epstein



2845 Russell Street
Berkeley, California 94705
March 10, 2017

Clerk of the United States Bankruptcy Court
The Alexander Hamilton Customs House
One Bowling Green
New York, New York 10004

Dear Sir or Madam:

Enclosed please find our objection to the trustee's motion which is to be considered on March 29 and a copy of the only version of that motion which is available to us.

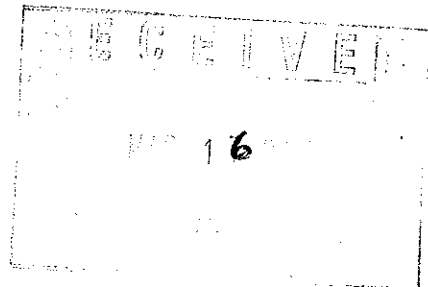
Thank you for your assistance

Sincerely,



Rebecca and Robert Epstein

c.c.: Honorable Stuart Bernstein
David Sheehan, Baker and Hostetler
Kevin Bell, and Nathaniel Kelley, SIPC



1/8/17

Baker & Hostetler LLP

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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF ADJOURNMENT OF HEARING ON TRUSTEE'S MOTION AND
MEMORANDUM OF LAW TO AFFIRM HIS DETERMINATIONS DENYING CLAIMS
OF CLAIMANTS HOLDING INTERESTS IN JUDY L. KAUFMAN ET AL. TENANCY
IN COMMON, RICHARD B. FELDER AND DEBORAH FELDER TENANCY IN
COMMON, AND KEITH SCHAFER, JEFFREY SCHAFER,
CARLA R. HIRSCHHORN TENANCY IN COMMON**

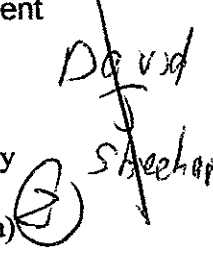
Irving H. Picard, trustee ("Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. § 78aaa *et seq.*, and the chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, hereby gives notice that the hearing date to consider the Trustee's Motion and Memorandum of Law to Affirm His Determinations Denying Claims of Claimants Holding Interests in Judy L. Kaufman *et al.* Tenancy In Common, Richard B. Felder and Deborah Felder Tenancy In Common, and Keith Schaffer, Jeffrey Schaffer, Carla R. Hirschhorn Tenancy In Common (the "Motion"), filed on January 13, 2017 (ECF No. 14844), which was previously scheduled for February 22, 2017 has been adjourned to **March 29, 2017**. The objection deadline for the Motion has passed and no objections were filed with this Court or received by the Trustee.

PLEASE TAKE FURTHER NOTICE that the hearing date to consider the portion of the Motion that seeks to affirm the Trustee's determination of Customer Claims 001463, 001515, and 001369 filed by Jonathan E. Felder, Jeffrey D. Felder and The Richard and Deborah Felder Foundation respectively, (the "Felder Objecting Claimants"), which relate to claimed interests in the Richard B. Felder and Deborah Felder Tenancy In Common BLMIS account (1ZA249), has been further adjourned to **April 26, 2017**.


PLEASE TAKE FURTHER NOTICE that the Trustee will file a supplemental motion and memorandum of law in support of affirming his determinations of the Felder Objecting Claimants' claims on or before **March 15, 2017**.

PLEASE TAKE FURTHER NOTICE that any written objections to the portion of the Motion related to the Felder Objecting Claimants must be filed with the Clerk of the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New

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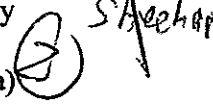
York, New York 10004 by no later than 4:00 p.m. on **April 3, 2017** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) 

Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq. and (b) the Securities Investor Protection Corporation, 1667


K Street, NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, Esq. and 

Nathanael S. Kelley, Esq. so as to be received on or before **April 3, 2017**. Any objection must specifically state the interest that the objecting party has in these proceedings and the basis of the objection to the Motion. Counsel for the Trustee has consulted with the Felder Objecting Claimants and the Felder Objecting Claimants consent to the adjournment of the hearing and the related objection deadline.

PLEASE TAKE FURTHER NOTICE that the above-referenced proceedings will be held before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, Courtroom 723 on **March 29, 2017** and **April 26, 2017** at **10:00 a.m.** or such other time as the Court determines.

York, New York 10004 by no later than 4:00 p.m. on **April 3, 2017** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) 

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